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Defendants.

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11	JoshCo Tech, LLC

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

JOSHCO TECH, LLC, a Nevada limited liability company, Plaintiff, EAGLE RISING VETERAN CONSULTING, LLC, an Alabama corporation; DWAYNE MOOREHOUSE, an individual,

Case No.: 2:20-cv-00451-RFB-DJA

STIPULATION AND (PROPOSED) DER FOR EXTENSION OF TIME FILE OPPOSITION TO FENDANTS' MOTION TO STAY SCOVERY PENDING RESOLUTION OF ITS MOTION TO **DISMISS PLAINTIFF'S COMPLAINT**

(First Request)

Pursuant to Rule 6 of the Federal Rules of Civil Procedure and District of Nevada Local Rule 6-1, Plaintiff JoshCo Tech, LLC ("JoshCo Tech") and Defendants Eagle Rising Veteran Consulting, LLC ("Eagle Rising") and Dwayne Moorehouse's ("Mr. Moorehouse") (collectively, "Defendants") state the following:

- 1. On July 1, 2020 Defendants filed Defendants' Motion to Stay Discovery Pending Resolution of Its Motion to Dismiss Plaintiff's Complaint ("Motion to Stay") (ECF No. 21);
- 2. Pursuant to Rules 6(a) and (d) of the Federal Rules of Civil Procedure and pursuant to Local Rule 7-2, JoshCo Tech has until July 15, 2020 to file and serve their opposition to the

Motion to Stay;

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- 3. On or about July 13, the parties' counsel conferred regarding their schedules, client availability and the general press of business; as a result, JoshCo Tech agreed to provide Defendants a 30-day extension for JoshCo Tech's previously served written discovery responses, and the parties agreed to provide reciprocal extensions on the briefing schedule for the Motion to Stay;
- 4. Accordingly, the parties hereby agree and stipulate that JoshCo Tech shall have up to and through Wednesday, August 5, 2020, to file and serve their opposition to the Motion to Stay and Defendants shall have up to and through September 2, 2020 to file and serve their reply to the Motion to Stay.

IT IS SO AGREED AND STIPULATED.

DATED this 15th day of July, 2020.

THE LAW OFFICE OF

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Attorneys for Plaintiff JoshCo Tech, LLC

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: July 16, 2020

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